

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE:	Gerald R. Galleshaw	:
	Debtor	:
		:
DAVID C. FRAIOLI and NEW	:	
ENGLAND AUTO CENTER, INC.	:	
Plaintiffs	:	CASE NO: 15-11047
	:	
V.	:	CHAPTER 7
	:	
GERALD R. GALLESASHAW,	:	ADV. PRO. NO.: 15-01023
Defendant	:	

JOINT MOTION TO EXTEND TIME TO FILE PRE-TRIAL STATEMENT

Now comes Plaintiffs, David C. Fraioli and New England Auto Center, Inc. (collectively “Plaintiff”) and Defendant/Debtor, Gerald R. Galleshaw (“Defendant”), by its counsel, hereby moves this honorable Court to allow a brief extension of time to a joint pre-trial statement in accordance to the Scheduling Order that was entered by this Court on November 5, 2015. As grounds therefore, the parties would like some additional time to have the opportunity to discuss resolution of the within matter. Further, the parties are scheduled to meet on April 26, 2016 to discuss potential resolution.

Wherefore, the parties respectfully request that a brief extension of time up to one to two weeks or a time that is convenient with this Court, be granted to allow the parties to submit a joint pre-trial statement.

David C. Fraioli and
New England Auto Center, Inc.
By its Attorneys,

/s/ Ryanna T. Capalbo, Esq.

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Gerald R. Galleshaw,
By his Attorney,

/s/ Todd Dion, Esq.

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Dated: April 20, 2016